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August 16, 2024

The Honorable Vince Chhabria  
Courtroom 5, 17<sup>th</sup> Floor  
450 Golden Gate Avenue  
San Francisco, California 94102

*Re: Bolbol v. Rowell Ranch Rodeo 3:23-cv-01652*

Dear Judge Chhabria,

I write in response to your question at last Thursday's hearing -August 15, 2024 - wherein you asked if there was caselaw regarding the harm a Cal. Civ. Code section 51.7 plaintiff needs to establish to prove liability. The California appellate court in *Los Angeles County Metropolitan Transportation Authority v. The Superior Court*, 123 Cal.App.4th 261 (2004) made clear that a plaintiff need only establish "he or she was a victim of the condemned discriminatory conduct." *Id.* at 267. The court also made clear that proof of actual damages is not required, "the civil penalty clearly provides a minimum compensatory recovery even in those cases where the plaintiff can show little or no actual damages." *Id.* at 271.

Thank you for your attention to this matter.

Sincerely,

/s/Joseph Cuviello

Joseph Cuviello

Plaintiff in Pro Se